REMARKS

Claims 42-65 are pending. Claims 42, 50, and 58 are in independent form.

In the action mailed July 28, 2005, claims 42 and 50 were objected to as being grammatically incorrect for reciting "at an authentication service."

Upon review, Applicant is unable to identify a grammatical or other error in the recitation of "at an authentication service." Applicant therefore respectfully traverses the objection.

If the objection is maintained, Applicant requests that more detail regarding the nature of the grammatical error be provided. Alternatively, the Examiner is invited to telephone the undersigned so that mutually agreeable language can be determined.

Claims 44-45 and 52-53 were rejected under 35 U.S.C. § 112, second paragraph as being indefinite. Claims 44-45 and 52-53 have been amended to address the Examiner's concerns. Further, claims 47 and 55 have been amended for the sake of consistency with these changes.

Independent Claims 42 and 50

Claims 42 and 50 were rejected under 35 U.S.C. § 103(a) as obvious over U.S. Patent No. 6,311,163 to Sheehan et al.

(hereinafter "Sheehan") and U.S. Patent No. 6,275,941 to Saito et al. (hereinafter "Saito").

As amended, claim 42 relates to a method that includes storing authentication information for a plurality of users, receiving digital credential information associated with a first user from a relying party at an authentication service, verifying the digital credential information using the authentication information, providing verification information associated with the first user to the relying party, and providing information from the authentication service to the first user, the information indicative of receiving the digital credential information associated with the first user from the relying party.

Claim 50 relates to an article comprising a machine-readable medium embodying information indicative of instructions. When the instructions are performed by one or more machines, operations comprising the method of claim 42 result.

The rejections of claims 42 and 50 contends that FIG. 5 of Sheehan describes providing, to a first user, information indicative of receiving digital credential information associated with the first user from a relying party, as recited in claim 42. Applicant respectfully disagrees.

In FIG. 5 of Sheehan, a user at a client 8 can request a service from an application server 6 and/or a database server 5. The service request includes an integrated certificate, which is authenticated by an authentication server 2. If the certificate is approved, the user's access history information is recorded both by authentication server 2 (Sheehan, Fig. 5, boxes 512, 542) and by the client 8 (Sheehan FIG. 5, boxes 532, 562). After the user has logged off, client 8 conveys its access history information to authentication server 2, which compares the two sets of access history information to check if the access was valid. *See Sheehan*, FIG. 5, box 570 and col. 8, line 35-44.

The user is thus not involved in Sheehan's authentication process except as the recipient of services. The access history information is not conveyed <u>to</u> the user, but rather <u>from</u> client 8 <u>to</u> authentication server 2. There is no mention in Sheehan that the user can be inserted into the path of this data transfer.

Further, even if the services themselves were taken to be "information indicative of receiving the digital credential information associated with the first user from the relying party," (a contention which was not raised in the rejection), please note that the services are not received from an authentication service, as recited in claims 42 and 50. Rather,

the services are received from application server 6 and/or a database server 5, which presumably correspond to the "relying party" of claims 42 and 50. Thus, Sheehan does not describe or suggest providing such information from the authentication service to the first user, as recited in claims 42 and 50

Saito does nothing to remedy this deficiency in Sheehan. Indeed, Saito only mentions in passing that information identifying a doctor can be part of his diagnostic system. *See Saito*, col. 4, line 18-22. Saito therefore also fails to describe or suggest providing, to a first user, information indicative of receiving digital credential information associated with the first user from a relying party, as recited in claims 42 and 50.

Since elements and/or limitations of claims 42 and 50 are neither described nor suggested by Sheehan and Saito, a *prima facie* case of obviousness has not been established. Accordingly, applicant requests that the rejections of claims 42, 50, and the claims dependent therefrom be withdrawn.

Independent Claim 58

Claim 58 was rejected under 35 U.S.C. § 103(a) as obvious over Sheehan and Saito.

Claim 58 relates to a system that includes storage configured to store authentication information for a plurality of users and an authentication server. The authentication

13

server is configured to receive digital credential information associated with a first user from a relying party, verify the digital credential information using the authentication information, provide verification information associated with the first user to the relying party, and provide information to the first user, the information indicative of receiving the digital credential information associated with the first user from the relying party.

The rejection of claim 58 contends that FIG. 5 of Sheehan describes an authentication server that is configured to provide information to a first user that is indicative of receiving digital credential information associated with the first user from a relying party, as recited in claim 58. Applicant respectfully disagrees.

As discussed above, a user is not involved in Sheehan's authentication process except as the recipient of services. Sheehan's access history information is not conveyed to the user, but rather from client 8 to authentication server 2.

Further, even if the services themselves were taken to be information "indicative of receiving digital credential information associated with the first user from a relying party," Sheehan's services are provided by an application server 6 and/or database server 5, and not by an authentication server as recited in claim 58.
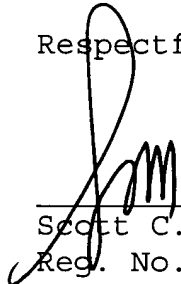
14

Saito only mentions in passing that information identifying a doctor can be part of his diagnostic system.

Accordingly, applicant requests that the rejections of claim 58 and the claims dependent therefrom be withdrawn.

Applicant asks that all claims be allowed. No fees are believed due at this time. Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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